

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 03-10387-DPW
)
 EARL CHARLEY)

ASSENTED-TO MOTION
TO CONTINUE HEARING DATE FOR FILING MOTION TO SUPPRESS

Defendant, Earl Charley, hereby moves to continue the evidentiary hearing scheduled for July 14, 2004 on his Motion to Suppress to a date to be scheduled. As grounds, counsel states he is on trial on July 14th in an older case (United States v. Watson, 01-10122-RWZ) which will preclude him from meeting with his out of state expert the day of the hearing. Upon the completion of the trial, counsel will consult with the Court, the AUSA and the expert to find the earliest available date and report to the Court no later than July 30th with a proposed date. (So far, counsel has not yet been able to find a date). Defendant requests the exclusion of the time from the Speedy Trial Act as in the interests of justice.

AUSA Chris Bator has indicated his assent to this motion.

EARL CHARLEY
By his attorney,

/s/ Leo Sorokin
Leo Sorokin
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